

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Pamela L. Orlowski,	)	Case No. 20-21514-JAD
	)	
Debtor.	)	Chapter 13
	)	
	)	Document No.
Nissan-Infiniti LT,	)	
	)	Related to Document No.: 26, 27
Movant,	)	
	)	
v.	)	
	)	<b>Hearing Date and Time:</b>
Pamela L. Orlowski,	)	September 16, 2020 at 11:00 a.m.
Ronda J. Winnecour, Trustee,	)	
	)	
Respondent(s).	)	

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes the Debtor, Pamela L. Orlowski ("Debtor"), by and through her counsel Brian C. Thompson, Esquire, and Thompson Law Group, P.C. files the within Response to Movant's Motion for Relief from the Automatic Stay with 30 Day Waiver, and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted. By way of further response, Paragraph 3 refers to a writing which speaks for itself.
4. Admitted. By way of further response, Paragraph 4 refers to a writing which speaks for itself.
5. Denied. By way of further response, Debtors an Interim Order Confirming Plan was entered on July 2, 2020. To date no funds have been distributed to any creditor.
6. Denied. By way of further response, Debtor has proposed assumption of payments by the US Trustee as part of the Interim Confirmed Plan.

7. Debtor is without information or knowledge to confirm the facts averred in Paragraph 7, and therefore denies the same.

8. Debtor is without information or knowledge to confirm the facts averred in Paragraph 8, and therefore denies the same.

9. Admitted. By way of further response, Debtor was employed by a school district and does not work during the summer months. However, the monthly plan payment is calculated to accommodate the arrears throughout the rest of the plan year. Furthermore, Debtor recently acquired new employment and will now be employed year around.

10. Denied. By way of further response, the filing of this motion is premature insomuch as this matter only recently has had a Plan confirmed on an interim basis and has not allowed reasonable time for the Trustee to distribute any funds.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny the Movant's Motion for Relief from the Automatic Stay and grant any other such relief as this Honorable Court deems just.

Respectfully submitted,

Date: August 24, 2020

/s/ Brian C. Thompson

Brian C. Thompson, Esquire

Attorney for Debtor

PA I.D. No. 91197

THOMPSON LAW GROUP, P.C.

125 Warrendale Bayne Road, Suite 200

Warrendale, Pennsylvania 15086

(724) 799-8404 Telephone

(724) 799-8409 Facsimile

[bthompson@thompsonattorney.com](mailto:bthompson@thompsonattorney.com)